

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

**IN RE APPLICATION OF MAKHPAL
KARIBZHANOVA FOR JUDICIAL
ASSISTANCE PURSUANT TO
28 U.S.C. § 1782**

MEMO ENDORSED

Case No. 1:21-MC-00442-KPF

**NOTICE OF MOTION TO
INTERVENE AND TO QUASH
SUBPOENAS AND FOR
PROTECTIVE ORDER**

PLEASE TAKE NOTICE that upon the annexed Declaration of Patrick D. Bonner, Jr., dated August 26, 2021, together with the exhibits annexed thereto, the Declaration of Jasmin Karibzhanova, dated August 24, 2021, and the accompanying Memorandum of Law, the undersigned will move this Court before the Honorable Katherine Polk Failla, United States District Judge for the Southern District of New York, at the United States Courthouse, 40 Foley Square, New York, New York 10007, at a date and time to be determined by the Court, for an order permitting Jasmin Karibzhanova to intervene in this action pursuant to Federal Rule of Civil Procedure 24, quashing the subpoenas issued by John W. Moscow, granting a protective order, and for such further and other relief as the Court may deem just and proper.

Dated: New York, New York
August 26, 2021

Respectfully submitted,

MENZ BONNER KOMAR & KOENIGSBERG LLP

By: s/ Patrick D. Bonner, Jr.

Patrick D. Bonner, Jr
John R. Menz

One North Lexington Avenue, Suite 1550
White Plains, NY 10601
Tel.: (914) 949-0222
Fax: (914)997-4117
Attorneys for Movant Jasmin Karibzhanova

The Court is in receipt of the motion filed by Jasmine Karibzhanova (Dkt. #23), as well as her request for oral argument (Dkt. #24). Ms. Makhpal Karibzhanova may file a response to the motion on or before **September 17, 2021**. The memorandum of law shall be no longer than 30 pages. A reply brief is not authorized. If the Court determines that oral argument would aid it in resolving the motion, the Court will issue a scheduling order in due course.

Dated: August 27, 2021
New York, New York

SO ORDERED.



HON. KATHERINE POLK FAILLA
UNITED STATES DISTRICT JUDGE